

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSE PANORA,
*on his own behalf and on behalf of
others similarly situated,*

Plaintiff,

-against-

DEENORA CORP.
d/b/a Dee's;
DEE's BRICK OVEN PIZZA, INC
d/b/a Dee's; and
DEERAN ARABIAN a/k/a Dee Arabian

Defendants.
-----X

Case No. 19-CV-7267 (BMC)

**DECLARATION OF DEERAN
ARABIAN IN OPPOSITION TO
PLAINTIFF'S MOTION FOR
CONDITIONAL COLLECTIVE
CERTIFICATION**

DEERAN ARABIAN declares under penalty of perjury:

1. I am a Defendant in the above-captioned action. I previously submitted a Declaration dated February 26, 2020 in support of Defendants' motion for summary judgment. I respectfully request that the Court incorporate that prior Declaration by reference and consider same in adjudicating Plaintiff's conditional certification motion.

2. I respectfully request that Plaintiff's motion for conditional collective certification be denied and that the Court award Defendants all further relief that it deems to be just and proper.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on September 10, 2020.


DEERAN ARABIAN